

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,	)	CASE NO. 8:23CR31
	)	
Plaintiff,	)	UNOPPOSED MOTION
	)	TO CONTINUE TRIAL
vs.	)	
	)	
TALIAFERRO D. THOMPSON,	)	
	)	
Defendant.	)	

COMES NOW the Defendant, TALIAFERRO D. THOMPSON, by and through his appointed attorney of record, Brent M. Bloom, and hereby moves this Court for an Order continuing the trial set in this matter for June 6, 2023 for approximately 60 days for the following reasons:

1. That plea negotiations with the U.S. Attorney's office are ongoing;
2. That counsel needs additional time to complete plea negotiations or prepare for trial;
3. That Defendant understands that he has a right to a speedy trial both under the Sixth Amendment to the United States Constitution and under 18 USC §3161 *et. seq.* and that this motion will, if granted pursuant to this request, extend the time during which his case may be called for trial, and that the time between filing this motion and the time that it is decided by the court may be excluded for the purpose of speedy trial calculations pursuant to the provisions of the Sixth Amendment to the United States Constitution and 18 USC § 3161 *et. seq.*;
4. That the interests of justice will be served by granting this motion;
5. That if the motion is not granted, a miscarriage of justice may occur;
6. That Julie Hansen, counsel for co-defendant Andrew Kincaid and the Assistant U.S. Attorney in charge of this matter, Lesley A. Woods, have been contacted and have indicated that they have no objection to this motion.

WHEREFORE, Defendant prays that this Honorable Court issue an order that the trial now set for June 6, 2023 be continued for approximately 60 days.

RESPECTFULLY submitted this 17th day of May, 2023.

BY: /s/Brent M. Bloom, #18239  
416 S. 14th Street  
Omaha, NE 68102  
(402)342-2833  
Attorney for Defendant

#### CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was filed May 17, 2023, electronically with the United States District Court for the District of Nebraska through CM/ECF and that the system generated electronic notification to:

Lesley A. Woods, Assistant United States Attorney for the District of Nebraska.  
Julie Hansen, Attorney for Andrew Kincaid

Dated this 17th day of May, 2023.

/s/Brent M. Bloom  
416 South 14th Street  
Omaha, Nebraska 68102  
(402) 342-2833  
Attorney for Defendant